

**Richard A. Gilbert  
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115 Christopher Street 2<sup>nd</sup> floor  
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**SCHOOLCRAFT v. CITY OF NEW YORK  
ITEMIZED SERVICES**

<b><u>DATE</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>Hrs/Rate</u></b>	<b><u>AMOUNT</u></b>
11/16/12	Meeting with my Peter Gleason, Esq. (PG), Retired NYPD 2 <sup>nd</sup> grade Detective (D2) and Larry Schoolcraft (LS) to confer on merits of claim Filed by Adrian Schoolcraft (AS) against NYC, Jamaica Hospital & other medical defendants Review of documents provided by LS.	14hrs. \$500	\$7,000
11/18/12	Further review of documents provided and tc's with PG relating to AS. Conferred with Harvey Levine(HL) re: merits of claim and potential strategies for litigation	5.5hrs. \$500	\$2,750 \$500
11/19/12	Meeting with PG to discuss case parameters & strategy relative to further AS and LS contact. & impact of LS documents provided. Confer with HL re: PG discussion & strategy	2.5hrs. \$500	\$1,250 \$500
11/22/12	Multiple phone conversation with PG regarding a meeting the following day with AS/LS. Confer with HL regarding potential strategies.	1.5hrs. \$500	\$750
11/23/12	Meeting with PG, AS, LS, in Albany to meet client Discussed scope of work, strategy, investigation.	10.5hrs. \$500	\$5,165
11/26/12	Confer with HL re: first AS meeting; Meeting with PG regarding obtaining Schoolcraft file from prior counsel (PC); review of client's smart drive, court notes and documents filed in USDC; TC with outgoing counsel; draft of correspondence to PC	3.4hrs. \$500	\$1700

11/27/12	Obtained phone for client; further review of smart drive and filed documents; follow up phone conversation with PG on PC file with PG regarding the Schoolcraft file. TC with PC & follow up correspondence Forwarding Consent	2.45hrs \$500	\$1,225
11/28/12	Review of PC case disbursements claimed as prereq. for transfer of file; research on atty. discharge for cause and excessive disbursements	4.2hrs. \$500	\$2,100
11/29/12	Research on "cause" continued; TC & email with AS re: facts underlying "cause" forward. TC with PG on "cause"	3.00hr. \$500	\$1,500
11/30/12	TC with PC re: transfer of file vs. allowable disb. Multiple TCs with PG on strategy and focus of investigation, discharge of PC "for cause" & Review of AS email and attachments; confer with HL regarding course of action	1.5hr.	\$500
12/2/12	TC's. with PG regarding correspondence to and conversation with PC.	.5hr. \$500	\$250
12/3/12	Review of email from PC; confer with HL re: same TC with PG regarding e-mail from PC.	.5hr. \$500	\$250
12/3/12	Phone conv. with AS regarding e-mail from his previous counsel, investigation and setting up another meeting.	.5hr. \$500	\$250
12/5/12	Review of e-mail from AS & TC with PG re: transfer of file from PC	.8hr. \$500	\$400
12/6/12	Phone conv. with PG re: VP investigation update	.25hr. \$500	\$125
12/7/12	Meeting with PG, re: NYPD disciplinary charges NYPD employment issues: confer with HL re: legal position on disciplinary charges & return to duty potential v. retirement	1.5hr. \$500	\$750
12/10/12	E-mail and TC with PG, re: file transfer/termination for cause of PC.	.5hr. \$500	\$250

12/11/12	TC with PG regarding Albany meeting with AS & others; confer with HL re: same	.5hr. \$500	\$250
12/13/12	review of E-mail from AS with Queens D.A. Press Release re: no criminality: multiple TC's with PG and AS & confer with HL re: same	3.0hr. \$500	\$1,500
12/14/12	Confer with HL re: press release; TC with PG, re: 1PP's position on AS.	1.0hr. \$500	\$500
12/14/12	review of PG E-mail to NYPD Asst. Comm. Kearns, re: Schoolcraft; confer with HL re: same	.125hr. \$500	\$62.50
12/17/12	Review of E-mail to Kearns (NYPD) re: Schoolcraft NYPD employment issues; confer with HL	.2hr. \$500	\$62.50
12/17/12	Meeting with PG, update on securing file from PC, NYPD employment issues, investigation	2hr. \$500	\$1,000
12/17/12	Additional research on discharge for cause. Conferred with HL re: merits of moving v. merits of negotiated transfer; conferred with PC reaching agreement on file transfer; draft letter	2.25hr. \$500	\$1,125
12/18/12	Confer with PG prior to file transfer; travel to PC Office to effectuate transfer of 6 banker boxes of files; brief review of files at PC office. Disbursements of \$4,630.45 paid to PC	6hr. Disb.	\$3,000 \$4,630.45
12/19/12	TC with AS & LS update & strategy discussed.	.7hrs. \$500	\$350
12/22/12	Review of PG E-mail re, amended complaint Discuss with HL	.2hrs. \$500	\$100
1/2/13	Meeting with HL & PG at office re: update on file review & discussion of "eyes only" file. continued review of file.	4.5hrs. \$500	\$2,250
1/4/13	Continued review of file; meeting with PG	6.0hrs. \$500	\$3,000

1/5/13	Continued review of file Memo to file.	3.5hrs. \$500	\$1,750
1/8/13	Meeting with PG, HL re: file contents strategy	3.5hrs.	\$1,750
1/9/12	Meeting with PG Re: investigation strategy.	.75hrs \$500	\$375
1/11/12	Meeting with PG, re: Union's failure to represent Confer with HL on failure/strategy	1.0hrs. \$500	\$500
1/12/12	Research on Union's failure to advocate for A.S	2.0	\$1,000
1/14/12	Meeting with PG, re: Queens DA. Research Discovery of D.A.'s investigative file: email PG Confer with HL regarding research outcome & strategy with regard to same	4.75hrs. \$500	\$2,375
1/16/12	Phone conv. with VP re: update, meeting to follow.	.125hrs. \$500	\$62.50
1/19/12	Multiple e-mails to/from PG, re: draft letter to NYPD & redrafts	1.5hrs. \$500	\$500
1/21/12	Review of PG, re: NYPD letter. Confer with HL regarding letter	.2hrs. \$500	\$100
1/22/12	Multiple emails to PG re: 1 PP letter Meeting with PG, Re: NYPD letter; revise letter	1.8hrs. \$500	\$900
1/23/12	Phone conv. with PG, Re: NYPD letter	.125hrs. \$500	\$62.50
1/25/12	Meeting with PG to discuss NYPD's response to e-mail communications.	.5hrs. \$500	\$250
1/29/12	Review of PG E-mail & affidavit from Center for Constitutional Rights (CCR)	.5hrs. \$500	\$250
1/29/12	Dinner meeting with PG, FS atty. Discuss potential expert consulting	1.5hrs. \$500	\$750
1/30/12	Confer with HL re: dinner meeting; multiple TC's with PG.	.7hrs.	\$350

1/31/12	Per conv. PG draft cease & desist to PC Regarding website	.4hrs. \$500	\$200
2/1/12	E-mail to PG, re: e-mail from CCR. Final draft cease & desist to PC re: website	.125hrs. \$500	\$62.50
2/2/13	Draft memo on warrantless search by NYPD TC's with AS & LS re: progress/strategy	2.5hrs. \$500	\$1,250
2/5/13	Research memo & draft subpoena to Queens D.A.	2.5hrs. \$500	\$1,250
2/6/13	Organize file for transfer to PG & Nat Smith (NS)	1.0hrs. \$500	\$500
2/7/13	Draft receipt to PG for transfer of hard copy of files For scanning for the legal team.	.5hrs. \$500	\$250
2/10/13	Review of file for deposition	3.0hrs. \$500	\$1,500
2/11/13	E-mails to/from PG, re: deposition.	.2hrs. \$500	\$100
2/11/13	Conf. call Chambers of Judge Scheindlin and conferred with AS, PG & NS NS, AS & RG.	2hrs. \$500	\$1,000
2/12/13	Prep and defense of deposition of AS	6hrs. \$500	\$3,000
2/13/13	Phone conv. with PG & NS, re: case status.	.5hrs. \$500	\$250
2/14/13	Meeting with PG & NS at office & file transfer of Nat Smith. Meeting with NS to discuss how file is formatted. Meeting with AS and legal team.	.5hrs. \$500	\$500
2/21/13	Email to PG re: file preservation	.25hrs.	\$125
2/27/13	Review of e-mail from Corp. Counsel containing additional "Attorney's eyes only" documents and discussion with PG & NS.	1.25hrs. \$500	\$625
3/1/13	Review of A.S. deposition transcript	1.3hrs.	\$650

3/5/13	TC's with PG updating status	.2hrs.	\$100
3/21/13	TC's with PG updating status	.3hrs.	\$150
3/25/13	TC's with PG updating status	.2hrs.	\$100
4/2/13	TC's with PG updating status	.2hrs.	\$100
4/8/13	TC's with PG regarding appearance SDNY re: gag order & other relief; review of papers in support and opposition to relief	.3hrs. 2.5hrs.	\$150 \$1,250
4/11/13	Appearance SDNY oral argument	2.0hrs.	\$1,000

Total Hours: 120.62@ \$500 per hour = \$63,810.00

Disbursements to PC 4,630.45

paid to NS for transfer

Of file to Levine & Gilbert -----

Total: 68,440.45